

1. That a bail review was held on August 4, 2023, in front of the Honorable Judge Earl W. Bartgis Jr.
2. That Defendant is a High School Graduate and has lived in Maryland his whole life.
3. That Defendant resides at 17719 Perlite Way, Hagerstown, MD.
4. That Defendant lives with Lisa Marth, to whom he provides half of her housing and other living costs, without which she would not be able to provide for herself.
5. That Defendant is also the primary caretaker for his Mother and Grandmother, who both suffer from diabetes, one of which has surgery coming up, and both of whom live nearby Defendant's residence.
6. That Defendant's job as Security Contractor at the National Institute for Standards and Technology will only remain open for him until August 28, 2023.
7. That Defendant's continued incarceration will result in the loss of his job, the loss of livelihood of Lisa Marth, and a decline in the quality of care and life for two elderly women with health problems.
8. That Defendant is not a flight risk, nor a risk to the community.

9. That Defendant has every intention of appearing before this Honorable Court.

WHEREFORE these reasons and others considered meritorious by this court, counsel requests that a bail review hearing be set in this matter.

Respectfully submitted,



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**CERTIFICATE OF UNRESTRICTED INFORMATION**

I certify that this submission does not contain any restricted information.

**CERTIFICATE OF SERVICE**

I certify that on this 11<sup>th</sup> day of August, 2023, a copy of the foregoing was e-filed and served to the State's Attorney for Frederick County.



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Thomas Maronick, Esquire (0801030020)